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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|  |                                  |
|--|----------------------------------|
| -----X                                     |                                  |
| <b>In re</b>                               | : <b>Chapter 11</b>              |
|  | :                                |
| <b>MOTORS LIQUIDATION COMPANY, et al.,</b> | : <b>Case No.: 09-50026 (MG)</b> |
| <b>f/k/a General Motors Corp., et al.</b>  | :                                |
|  | :                                |
| <b>Debtors.</b>                            | : <b>(Jointly Administered)</b>  |
|  | :                                |
| -----X                                     |                                  |

**GENERAL MOTORS LLC’S COUNTER-DESIGNATION  
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD  
ON APPEAL REGARDING THE APPEAL OF THE  
BANKRUPTCY COURT’S AUGUST 31, 2017 OPINION [ECF NO. 14087]**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), General Motors LLC (“**New GM**”) submits this counter-designation of additional items to be included in the record on appeal in connection with the appeal of the *Memorandum Opinion and Order Enforcing Provisions of Sale Order Regarding Assumption of Product Liability Claims of Kaitlyn Reichwaldt*, dated August 31, 2017 [ECF No. 14087] (the “**August 2017 Opinion**”).

**COUNTER-DESIGNATION OF RECORD**

In addition to the items designated by Appellant in her *Statement of Issues and Designation of Record on Appeal* [ECF No. 14123], New GM submits the following designation of additional items to be included in the record on appeal of the August 2017 Opinion (including any exhibit, annex, appendix or addendum thereto):

| <b><u>Item No.</u></b> | <b><u>Date Filed</u></b> | <b><u>Description</u></b>  | <b><u>Docket No.</u></b> |
|------------------------|--------------------------|--|--------------------------|
| 1.                     | 12/4/2015                | Judgment of the Bankruptcy Court, dated December 4, 2015.  | 13563                    |
| 2.                     | 12/13/2016               | Order to Show Cause Regarding Certain Issues Arising From Lawsuits With Claims Asserted Against General Motors LLC (“New GM”) That Involve Vehicles Manufactured by General Motors Corporation (“Old GM”).   | 13802                    |
| 3.                     | 12/21/2016               | Certificate of Service of the Order to Show Cause Regarding Certain Issues Arising From Lawsuits With Claims Asserted Against General Motors LLC (New GM) That Involve Vehicles Manufactured By General Motors Corporation (Old GM), entered on December 13, 2016. | 13804                    |
| 4.                     | 2/27/2017                | Opening Brief by General Motors LLC on the 2016 Threshold Issues Set Forth in the Order to Show Cause, Dated December 13, 2016 (Except for the Late Proof of Claim Issue).   | 13865                    |
| 5.                     | 2/27/2017                | Plaintiffs’ Joint Opening Brief on the 2016 Threshold Issues.  | 13866                    |
| 6.                     | 4/07/2017                | Reply Brief by General Motors LLC on the 2016 Threshold Issues Set Forth in the Order to Show Cause, Dated December 13, 2016 (Except for the Late Proof of Claim Issue).   | 13888                    |
| 7.                     | 4/07/2017                | Plaintiffs’ Joint Reply Brief on the 2016 Threshold Issues.  | 13889                    |

Dated: New York, New York  
October 12, 2017

Respectfully submitted,

/s/ Arthur Steinberg  
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